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December 19, 2007

Bonnie Lavelle  
Remedial Project Manager  
Libby Asbestos Superfund Site, OU3  
EPA Region 8  
1595 Wynkoop Street  
8EPR-SR  
Denver, CO 80202-1129

RE: Libby OU3 Bark Samples

Dear Bonnie,

EMSL has requested permission to outsource OU3 Bark Samples to an additional EMSL facility located in Beltsville, MD. EMSL understands EPA's concern for data consistency, integrity and quality. Please be assured that all EMSL facilities are NVLAP accredited, employ experienced analysts, utilize the same Laboratory Management Information System (LIMS) and operate under the same Quality Assurance Manual (QAM). This particular laboratory is additionally accredited by the American Industrial Hygiene Association (AIHA) under their IHLAP program for asbestos analysis. The two analysts that would be analyzing the samples are Joe Centifonti and Brett Macey. Joe possesses a BS in Biology and has 21 years of experience performing asbestos analysis via TEM, the past 13 years have been with EMSL. Brett possesses a BS and MS in Geology and has close to 9 years of asbestos analysis experience via TEM, all of which are with EMSL.

Both analysts have analyzed hundreds of TEM ISO 10312 samples in support of the EPA Region 8 activities for Libby in which EMSL has been under contract with CDM since 2000. Both analysts have extensive experience with the identification of Libby Amphiboles and have been given mineral standards provided to EMSL by USGS in Denver. These standards have been prepared to TEM grids and are available to the analysts in their respective laboratory as reference materials. Representative EDXA spectra of Libby Amphiboles have been observed and printed out and reside in the Beltsville TEM analysis room for visual reference. Both analysts have completed in depth ISO 10312 counting and recording rules training conducted by EMSL's National Director of Asbestos, Ed Cahill. Web training was conducted and a blind test was administered and passed by both analysts. This training and testing was coupled with numerous conference calls as well as dissemination of general and Libby specific mineralogical reference documents. All training items are documented in a training checklist culminating in a Demonstration of Capability (DOC) for both analysts as prescribed by ISO 17025 quality system guidelines.

The Beltsville lab is currently in the process of obtaining and evaluating EDXA spectra from particles of the BIR-1G glass standard prepared by the USGS as described in the March 23, 2005 US EPA Memo issued by Mary Goldade of EPA Region 8. Once this study is completed, we will forward the results to you for your review. Based on the justification provided herein, EMSL respectfully requests your permission to send the Libby OU3 Tree bark samples to our Beltsville, MD laboratory for analysis prior to the completion of the BIR-1G study and EPA site assessment. We appreciate your consideration of this request, which if granted, will result in an improvement of analytical capacity for time critical results while meeting the data quality objectives for the EPA on this project.





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If you require any additional information, including but not limited to, resumes, laboratory accreditations, training records, etc., please feel free to contact me at 800-220-3675, ext. 1256.

Sincerely,  
EMSL Analytical, Inc.

Robert J. DeMalo, M.Sc.  
Senior Vice President, Laboratory Services  
Libby Project Team Leader

cc: Robert Marriam, Remedium  
Ed Cahill, EMSL Analytical, Inc.  
Joe Centifonti, EMSL Analytical, Inc.  
Charles LaCerra, EMSL Analytical, Inc.



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